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August 22, 2006

BY HAND DELIVERY AND E-FILE

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station  
Boston, MA 02110

Re: Bay State Gas Company, D.T.E. 06-31

Dear Ms. Cottrell:

Enclosed for filing, on behalf of Bay State Gas Company ("Bay State"), please find Bay State's response to the following Information Request:

**DTE-BSG 1-14 (SUPPLEMENTAL)**

Please do not hesitate to telephone me with any questions whatsoever.

Very truly yours,

Patricia M. French

cc: Paul Osborne (DTE)  
A. John Sullivan (DTE)  
Alexander Cochis, Assistant Attorney General (4 copies)  
Charles Harak, Esq. (UWUA)  
Nicole Horberg Decter, Esq. (USW)  
Service List

COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

RESPONSE OF BAY STATE GAS COMPANY TO THE  
FIRST SET OF INFORMATION REQUESTS FROM THE DTE  
D.T.E. 06-31

Date: August 22, 2006

Responsible: Stephen H. Bryant, President

**SUPPLEMENTAL RESPONSE**

DTE-BSG-1-14      Refer to Exh. BSG-1, at 16, lines 19-20. Provide the exact number of "redundant staff" that were eliminated due to the NiSource acquisition of Columbia. Also, provide a corresponding list of the positions that were eliminated and the location of the employees that filled the redundant positions.

RESPONSE:      As the Department might expect, Bay State is unable to provide an exact number of "redundant staff," eliminated due to the NiSource acquisition of the Columbia Energy Group, or CEG.

By way of explanation, first, Bay State refers to its staffing requirements as filled by "full time equivalent" or FTE. The increase or reduction in such numbers corresponds to required staffing levels to provide safe and reliable utility service. Second, there is no one-for-one correlation of FTEs that could be called redundant because of the many reorganizations NiSource accepted as part of the challenges in taking multiple multi-state companies and reshaping them into a single corporation made of many regulated entities served by a single service company, NCSC. For example, the equivalent of the current Regulatory Accounting group, which assists in such matters as the compilation of gas cost and rate case filings, used to serve Bay State, as well as Northern's Maine Division and its New Hampshire Division prior to the NiSource and CEG merger. However, this group now serves NiSource's Energy Distribution Group, including Bay State, Northern's Maine Division, Northern's New Hampshire Division, Columbia Gas of Kentucky, Columbia Gas of Maryland, Columbia Gas of Pennsylvania and Columbia Gas of Virginia. As a result of this expanded and centralized responsibility, certain function previously located in Bay State's territory are now consolidated to one location within the NiSource organization. Most of the consolidations for redundancy took place in administrative and general (A&G) functions, such as Regulatory Accounting, General Accounting, Finance, Tax, etc. Most FTEs in NCSC are located in Columbus, Ohio.

In addition, Bay State is still researching this request to ensure that no further analysis will yield a more complete answer. If further information is developed or discovered, Bay State will supplement this response when the information has been compiled.

**SUPPLEMENTAL  
RESPONSE:**

Please see Attachment DTE-BSG-1-14 SUPPLEMENT for a list of the positions associated with Bay State's full time non-union and union employees who left the Company between 2000 – 2004 due to position elimination, elected retirement and discharge. As explained above, it is very difficult for the Company to provide the exact number of "redundant staff" eliminated due to the NiSource acquisition of CEG, because the best source for employee records (i.e., PeopleSoft) does not include detailed reasons for position termination. For example, one position could have been eliminated due to redundancy, a second due to changes in organizational structure or a shift in business needs, and a third position might not have been filled after the employee retired.

However, Attachment DTE-BSG-1-14 SUPPLEMENT reflects a reasonable representation of the number of Bay State's full time positions "eliminated" due to both the centralization and reorganization of NiSource following both its acquisition of Bay State and CEG. As noted above, the location of the employees that filled the redundant positions during this period is mainly Columbus, Ohio, while certain other positions were consolidated in Merrillville, Indiana.

**Positions of Employees of Bay State No Longer Employed by Reason, from 2000 to present**

<b>Title</b>	<b>Supervising Department</b>	<b>Location</b>	<b>Effective Date</b>	<b>Comments</b>
<b>NON BARGAINING UNIT EMPLOYEES</b>				
<b>2000</b> Traffic Coordinator	Call Center	Springfield	12/11/2000	Discharge
Training Specialist	Call Center	Springfield	12/11/2000	Discharge
Sr System Programmer / Analyst	IT	Westborough	2/4/2000	Position Eliminated
Sr System Programmer / Analyst	IT	Westborough	2/4/2000	Position Eliminated
Director Marketing Sales	Sales Administration	Westborough	03/15/00	Position Eliminated
I/O Control Clerk	IT	Westborough	04/07/00	Position Eliminated
Production Coordinator	IT	Westborough	04/07/00	Position Eliminated
Mgr, Corporate Planning	Planning	Westborough	04/12/00	Position Eliminated
Sr VP Regulatory Rev Devl	Rev and Reg Development	Westborough	04/14/00	Position Eliminated
Controller	Accounting/Reporting	Westborough	04/28/00	Position Eliminated
Supv Training	HR	Westborough	05/12/00	Position Eliminated
HR Manager	HR	Brockton	5/22/2000	Position Eliminated
Chairman and CEO	Administration - Executive	Westborough	8/1/2000	Position Eliminated
VP	Regulatory Affairs	Westborough	9/22/2000	Position Eliminated
Budget Assistant	Accounting/Reporting	Lawrence	12/11/2000	Position Eliminated
Analyst, Budget	Financial Planning & Budgeting	Westborough	12/11/2000	Position Eliminated
Sr. Financial Planner	Financial Planning & Budgeting	Westborough	12/11/2000	Position Eliminated
Supv, Computer Operations	IT Operations	Westborough	12/11/2000	Position Eliminated
Mgr, System Services	IT Operations	Westborough	12/11/2000	Position Eliminated
Analyst, Cash Mangement	Treasury	Westborough	12/11/2000	Position Eliminated
Manager	Regulatory Affairs	Westborough	12/11/2000	Position Eliminated
Mgr, Comm & Govt	Public Affairs/Communications	Lawrence	12/11/2000	Position Eliminated
Communications Generalist	Public Affairs/Communications	Westborough	12/11/2000	Position Eliminated
Account Executive	Marketer Services	Brockton	12/11/2000	Position Eliminated
HR Manager	HR	Westborough	12/11/2000	Position Eliminated
Inspector	Customer Connect	Springfield	12/11/2000	Position Eliminated
Inspector	Customer Connect	Springfield	12/11/2000	Position Eliminated
Technical Trainer	EP&S	Lawrence	12/11/2000	Position Eliminated
Supv, Corrosion	System Maintenance	Springfield	12/11/2000	Position Eliminated
Engineering Assistant	Engineering and Construction	Brockton	12/11/2000	Position Eliminated
Exec VP, CFO, Treasurer	Administration - Executive	Westborough	6/13/2000	Position Eliminated
<b>2001</b>				
Supv, Call Center	Call Center	Springfield	11/19/2001	Discharge
Mgr, Rev and Accounts	Gas Rev Accts	Westborough	6/30/2001	Position Eliminated
Computer Operator	IT BS Data Ctr	Westborough	10/26/2001	Position Eliminated
Director Financial Perf Mgm	Accounting/Reporting	Westborough	3/31/2001	Position Eliminated
Cash Assistant	Treasury	Westborough	6/29/2001	Position Eliminated
Specialist, Regulatory Policy	Regulatory Affairs	Westborough	4/6/2001	Position Eliminated
Mgr, Treasury	Treasury	Westborough	5/31/2001	Position Eliminated
Revenue Accountant	Gas Rev Accts	Westborough	6/30/2001	Position Eliminated
Director Technical Operations	Technical Operations	Westborough	2/2/2001	Position Eliminated
Mgr, IT Services Delivery	IT BS Data Ctr	Westborough	7/9/2001	Position Eliminated
Analyst, Risk Ins Claims	Legal/Insurance	Westborough	3/31/2001	Position Eliminated
Ldr, Customer Choice Implementation	Regulatory Affairs	Westborough	1/15/2001	Position Eliminated
Benefits Assistant	HR	Westborough	4/1/2001	Position Eliminated
Computer Operator	IT BS Data Ctr	Westborough	7/26/2001	Position Eliminated
Revenue Accountant	Gas Rev Accts	Westborough	6/30/2001	Position Eliminated
Billing Rep	Bills and Inquiries	Lawrence	11/29/2001	Retirement
<b>2002</b>				
Supervisor Call Center	Call Center	Springfield	2002-12-20	Discharge
Supv, Service	Service	Brockton	2002-08-01	Elected Voluntary Retirement
Supv, Service	Service	Brockton	2002-08-01	Elected Voluntary Retirement
Manager Gas Operations	Gas Operations	Brockton	2002-09-01	Elected Voluntary Retirement
Supv, Distribution	Distribution	Brockton	2002-09-01	Elected Voluntary Retirement
Supv, Distribution	Distribution	Brockton	2002-10-01	Elected Voluntary Retirement
Supv, Service	Metering	Springfield	2002-01-02	Elected Voluntary Retirement
Supv, Service	Customer Service	Springfield	2002-08-01	Elected Voluntary Retirement
Supv, Metering	Field Collections	Springfield	2002-09-01	Elected Voluntary Retirement
Supv, Maps & Records	Distribution	Springfield	2002-12-01	Elected Voluntary Retirement
Non Key Account Representative	Sales Construction	Brockton	2002-01-01	Position Eliminated
Reporting Coordinator	Sales Construction	Brockton	2002-01-01	Position Eliminated
Non Key Account Representative	Sales Construction	Brockton	2002-01-01	Position Eliminated

<b>Title</b>	<b>Supervising Department</b>	<b>Location</b>	<b>Effective Date</b>	<b>Comments</b>
Non Key Account Representative	Sales Construction	Brockton	2002-01-01	Position Eliminated
Non Key Account Representative	Sales Construction	Brockton	2002-01-01	Position Eliminated
Supv, Distribution	Distribution	Brockton	2002-05-04	Position Eliminated
Manager Customer Account Billi	Billing	Brockton	2002-08-15	Position Eliminated
Manager Sales	Sales Administration	Brockton	2002-11-30	Position Eliminated
Representative Sales Comm/Bldr	Sales Construction	Brockton	2002-11-30	Position Eliminated
Supv, Distribution	Distribution	Springfield	2002-01-01	Position Eliminated
Field Engineer	Engineering & Construction	Springfield	2002-01-01	Position Eliminated
Non Key Account Representative	Sales Construction	Brockton	2002-01-01	Position Eliminated
Assistant, HR-Non-Exempt	HR	Springfield	2002-01-01	Position Eliminated
Project Manager-Bus Devl	Sales Administration	Westborough	2002-01-01	Position Eliminated
Reporting Manager	Reporting	Westborough	2002-01-01	Position Eliminated
Project Manager-Oper Pln	Operational Planning & Develop	Westborough	2002-01-01	Position Eliminated
Manager Customer Systems Suppo	Ed Application Development	Westborough	2002-01-01	Position Eliminated
Analyst, Transportation	Transportation	Westborough	2002-01-01	Position Eliminated
Director Operational Plng Dev	Operational Planning & Develop	Westborough	2002-01-01	Position Eliminated
Analyst, Market Research	Sales Administration	Westborough	2002-01-01	Position Eliminated
Project Manager-Bus Devl	Sales Administration	Westborough	2002-01-01	Position Eliminated
Technical Trainer	Operational Planning & Develop	Westborough	2002-02-02	Position Eliminated
Project Manager-Bus Devl	Sales Administration	Westborough	2002-02-19	Position Eliminated
Manager Payroll	Payroll	Westborough	2002-07-01	Position Eliminated
Sr Engineer	Technical Operations	Westborough	2002-09-01	Elected Voluntary Retirement
Senior Director HR and Lab Rel	HR	Westborough	2002-11-09	Position Eliminated
Manager Gas Supply Cap Plng/Dm	Sales Forecasting & Analysis	Westborough	2002-11-23	Position Eliminated
Sr Analyst, Performance	Admin - Operations	Westborough	2002-11-30	Position Eliminated
Director Customer Operations	Operational Services Admin	Westborough	2002-11-30	Position Eliminated
Payroll Assistant	Payroll	Westborough	2002-01-01	Position Eliminated
Administrative Assistant	HR	Westborough	2002-01-01	Position Eliminated
Payroll Assistant	Payroll	Westborough	2002-01-01	Position Eliminated
Maintenance Assistant	Facilities	Westborough	2002-01-01	Position Eliminated
Administrative Asst Engr	Technical Operations	Westborough	2002-01-01	Position Eliminated
Payroll Assistant	Payroll	Westborough	2002-01-31	Position Eliminated
Manager Benefits	HR	Westborough	2002-02-16	Position Eliminated
Non Key Account Representative	Sales Key Account	Lawrence	2002-01-01	Position Eliminated
Key Account Representative	Sales Key Account	Lawrence	2002-01-01	Position Eliminated
Supv, Metering	Metering	Lawrence	2002-05-27	Retirement
Manager Operations Lawrence	Admin - Field Location	Lawrence	2002-07-01	Elected Voluntary Retirement
Supv, Distribution	Distribution	Lawrence	2002-09-01	Elected Voluntary Retirement
Representative Sales Comm/Bldr	Sales - Residential Sales	Lawrence	2002-11-30	Position Eliminated
Administrative Assistant	Distribution	Lawrence	2002-12-01	Elected Voluntary Retirement
<b>2003</b>				
Team Leader CIS Billing	Billing	Brockton	2003-01-01	Elected Voluntary Retirement
Key Account Representative	Sales Key Account	Brockton	2003-01-01	Position Eliminated
Supv, Lng Shift Operations	Gas Operations	Brockton	2003-11-01	Elected Voluntary Retirement
Team Leader	Call Center	Springfield	2003-03-01	Position Eliminated
Executive Vice President & COO	Exec Admin	Westborough	2003-01-01	Position Eliminated
<b>2004</b>				
Supv, Lng Shift Operations	Gas Operations	Brockton	2004-09-01	Elected Voluntary Retirement
Executive Admin Assistant	Admin Operations	Westborough	2004-01-01	Elected Voluntary Retirement
<b>2005</b>				
Leader Field Operations	Service	Brockton	2005-01-01	Elected Voluntary Retirement
<b>BARGAINING UNIT EMPLOYEES</b>				
<b>2000</b>				
Collector	Collections/Revenue Recovery	Lawrence	1-Feb-00	Elected Voluntary Retirement
Customer Relations Rep	Collections/Revenue Recovery	Brockton	1-Jul-00	Elected Voluntary Retirement
<b>2001</b>				
Meter Reader	Meter Reading	Springfield	2003-01-01	Discharge
Welder	Distribution	Springfield	12/1/2001	Elected Voluntary Retirement
Lead Piperfitter	Service	Springfield	5/2/2001	Elected Voluntary Retirement
Lead Service Tech	Service	Brockton	8/1/2001	Elected Voluntary Retirement
Lead Service Tech	Service	Brockton	11/29/2001	Elected Voluntary Retirement
Meter Repair Helper	Meter Shop	Springfield	2/1/2001	Elected Voluntary Retirement
Customer Relations/Credit Rep	Collections/Revenue Recovery	Brockton	7/1/2001	Elected Voluntary Retirement
Workforce Planning Rep	Distribution	Brockton	9/1/2001	Elected Voluntary Retirement
Meter Repair A	Meter Shop	Springfield	5/1/2001	Elected Voluntary Retirement
<b>2002</b>				
Leader-Fitter	Distribution	Brockton	2002-07-01	Elected Voluntary Retirement

<b>Title</b>	<b>Supervising Department</b>	<b>Location</b>	<b>Effective Date</b>	<b>Comments</b>
Service Technician A	Field Collections	Brockton	2002-08-01	Elected Voluntary Retirement
Distribution Operator A	Distribution	Lawrence	2002-10-02	Other
Metscan Installer	Metering	Lawrence	2002-09-01	Elected Voluntary Retirement
Inspector	Distribution	Brockton	2002-08-01	Elected Voluntary Retirement
Installer/Fitter/Serv Tech A	Service	Brockton	2002-10-01	Elected Voluntary Retirement
Lead Fitter Operator	Distribution	Brockton	2002-11-01	Elected Voluntary Retirement
Maintenance Assistant	Facilities	Springfield	2002-02-01	Elected Voluntary Retirement
Lead Distribution Operator	Distribution	Springfield	2002-07-01	Elected Voluntary Retirement
<b>2003</b> Distribution Operator Lead	Distribution	Lawrence	2003-04-01	Elected Voluntary Retirement
Drafting Technician Special	Eng & Const Brockton	Brockton	2003-07-01	Elected Voluntary Retirement
Customer Billing Rep(Cust Serv	Billing	Brockton	2003-07-01	Elected Voluntary Retirement
Metscan Clerk	Scheduling	Brockton	2003-07-01	Elected Voluntary Retirement
Service Technician A	Customer Service	Lawrence	2003-07-01	Elected Voluntary Retirement
Lead Service Technician	Customer Service	Springfield	2003-09-01	Elected Voluntary Retirement
Data Entry Clerk(Customer Bill	Data Entry	Brockton	2003-11-01	Elected Voluntary Retirement
<b>2004</b> Collector/Scheduler B	Field Collections	Lawrence	2004-03-01	Elected Voluntary Retirement
Drafting Technician A	Distribution	Brockton	2004-04-01	Elected Voluntary Retirement
Metscan Installer	Metering	Lawrence	2004-04-01	Elected Voluntary Retirement
Storekeeper	Stores	Lawrence	2004-06-01	Elected Voluntary Retirement
Lead Maintenance Mechanic	Metering	Springfield	2004-07-01	Elected Voluntary Retirement
Lead Pipefitter	Service	Springfield	2004-07-01	Elected Voluntary Retirement
Distribution Operator A	Distribution	Brockton	2004-08-01	Elected Voluntary Retirement
Distribution Operator B	Distribution	Springfield	2004-09-30	Elected Voluntary Retirement